

Disclosure as to Expert Witness Zuhair Jumah Al-Maliki

I. Statement of Opinion, Basis, and Reasons

The following is "a complete statement of all opinions that the government will elicit from the witness in its case-in-chief, or during its rebuttal to counter testimony that the defendant has timely disclosed under (Rule 16(b)(1)(C), and the bases and reasons for them." Fed. R. Crim. P. 16(a)(1)(G)(iii):

The Government expects Zuhair Jumah Al-Maliki to testify that in 2015: (1) torture was illegal under the Iraqi Constitution; (2) torture was illegal under Iraqi criminal statutes; and (3) unlawful detention was illegal in Iraq and detention was legal only if authorized by a judicial proceeding and had to have been in a lawful place for detention. In addition, Mr. Al-Maliki may testify as to whether certain actions described to him would constitute torture under Iraqi law.

II. Qualifications

The attached CV lists "the witness's qualifications, including a list of all publications authored in the previous 10 years." Fed. R. Crim. P. 16(a)(1)(G)(iii):

III. List of Cases

The witness has not testified during the previous four years as an expert at trial or by deposition. Fed. R. Crim. P. 16(a)(1)(G)(iii):

Respectfully submitted,

04.3.2023
Date

Zuhair Jumah Al-Maliki

DEFENDANT'S
EXHIBIT

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